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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PHILLIP SITBON, Plaintiff, v. CITY OF PORTLAND, PORTLAND POLICE BUREAU OFFICER CRAIG LEHMAN, and JOHN DOES 1-10, Defendants.	Case No. 3:22-cv-01148-SI MOTION FOR EXTENSION OF TIME <i>(Unopposed)</i>
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LR 7-1 CERTIFICATION

Pursuant to Local Rule 7-1, Jonathan Gersten, counsel for Plaintiff Phillip Sitbon, hereby certifies that he has conferred with Counsel for the Defendants and that they do not oppose this motion.

RELIEF REQUESTED

Plaintiff requests a Rule 16 Conference to adopt the proposed deadlines listed below.

ARGUMENT AND AUTHORITY

MOTION FOR EXTENSION OF TIME
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The parties completed the Rule 26(f) conference on February 16, 2023. Given the parties' and counsels' schedules, they have agreed to the following proposed case management schedule:

Initial Disclosures: Friday, April 28, 2023

Close of Discovery: Friday, August 25, 2023

Deadline to Join Parties/Claims and Amend Pleadings: Friday, September 29, 2023

Expert Witness Disclosure: Friday, October 27, 2023

Expert Witness Discovery Exchange: Friday, December 15, 2023

Dispositive Motions: Friday, February 16, 2024

CONCLUSION

Based on the foregoing, Plaintiff requests that this unopposed motion be granted, and that the response deadlines be set.

DATED: March 17, 2023.

/s/Jonathan Gersten
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Of Attorneys for Plaintiff